

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NORFOLK COUNTY RETIREMENT
SYSTEM and BROCKTON
CONTRIBUTORY RETIREMENT
SYSTEM, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

DANIEL C. USTIAN, ROBERT C.
LANNERT, MARK T.
SCHWETSCHENAU, NAVISTAR
INTERNATIONAL CORPORATION, and
DELOITTE & TOUCHE LLP.

Defendants.

No. 07 C 7014

Judge Robert W. Gettleman

KEVIN MEMOLI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAVISTAR INTERNATIONAL
CORPORATION, DANIEL C. USTIAN,
ROBERT C. LANNERT, MARK T.
SCHWETSCHENAU, and DELOITTE &
TOUCHE LLP.

Defendants.

No. 08 C 107

Judge Robert W. Gettleman

**NORFOLK COUNTY RETIREMENT SYSTEM
AND BROCKTON CONTRIBUTORY RETIREMENT SYSTEM'S
MOTION FOR CONSOLIDATION, TO BE APPOINTED LEAD PLAINTIFF
AND FOR APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

Plaintiffs, the Norfolk County Retirement System (“Norfolk”) and the Brockton Contributory Retirement System (“Brockton”) (collectively, the “Massachusetts Retirement Systems”) respectfully move for entry of an Order (a) consolidating the two above-captioned securities class actions and any subsequently-filed related actions (the “Action”); (b) appointing the Massachusetts Retirement Systems as Lead Plaintiff in the Action and in any consolidated related actions; and (c) approving the Massachusetts Retirement Systems’ selection of Wolf Popper LLP (“Wolf Popper”) and Robinson Curley & Clayton, P.C. (“Robinson Curley”) as Co-Lead Counsel.

In support of this Motion, plaintiffs submit the accompanying Memorandum of Law.

Respectfully submitted,

**NORFOLK COUNTY RETIREMENT SYSTEM and
BROCKTON CONTRIBUTORY RETIREMENT
SYSTEM**

Dated: February 15, 2008

s/ Lester L. Levy
One of Their Attorneys

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***Attorneys for The Massachusetts Retirement
Systems and Proposed Co-Lead Counsel for the Class***

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2008, I caused to be electronically filed the foregoing **Norfolk County Retirement System and Brockton Contributory Retirement System's Motion For Consolidation, To Be Appointed Lead Plaintiff and For Approval of its Selection of Lead Counsel**, with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

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